

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

*In re:* |  
GILVIA VONZELLA WILSON, | Chapter 13  
| Case No: 17-36405-KLP  
Debtor. |

**DEBTOR'S STATEMENT OF ISSUES AND DESIGNATION OF RECORD ON APPEAL**

Debtor Gilvia Wilson (“Debtor”), by Counsel, submits this Statement of Issues and Designation of Record on Appeal pursuant to Rule 8009(a) of the Federal Rules of Bankruptcy Procedure with respect to her appeal from the Order Terminating Automatic Stay, dated January 25, 2019 (Document Number 77) (“Order”), and respectfully states as follows:

**STATEMENT OF ISSUES**

The appeal by Debtor addresses the following issues:

1. Did the Bankruptcy Court err in determining that Creditor, Trustees Under the Stan S. Cutler Revocable Trust Agreement (“Creditor”) met its burden of proof under 11 U.S.C. 362 (g) on the issue of debtor’s equity in the property (to wit: 2444 County Drive);
2. Did the Bankruptcy Court err in determining that Creditor was a party in interest in the property (to wit: 2448 County Drive);
3. Did the Bankruptcy Court err in determining that debtor was in default under the Notes and Deeds of Trust and under the Chapter 13 plan.

**DESIGNATION OF RECORD**

Debtor hereby designates (i) the transcript for hearing on Creditor's Motion for Relief from Stay on January 9, 2019, ordered by Debtor on **February 22, 2019** and (ii) the following items for inclusion in the record on appeal (including any exhibit, annex, or addendum thereto):

<b><u>Description</u></b>	<b><u>Filing Date</u></b>	<b><u>Document No.</u></b>
Motion for Relief from Stay	12/09/2018	71
Order Granting Motion for Relief from Stay	01/25/2019	77
Notice of Appeal	02/08/2019	79

Dated: February 22, 2019

Respectfully Submitted,

/s/ Jacob W. Early

Jacob W. Early  
VSB No. 88623  
Woehrle Dahlberg Jones Yao PLLC  
1900 East Parham Road  
Richmond, Virginia 23228  
(804) 261-2694 telephone  
(804) 553-0784 facsimile  
[jearly@lawfirmvirginia.com](mailto:jearly@lawfirmvirginia.com)  
*Counsel for Debtor,*  
*Gilvia Vonzella Wilson*